Mr. William Roth
The Braun Corporation
P.O. Box 310
Winamac, IN 46996

Re: 113-11117
First Administrative Amendment to
Part 70 131-7058-00017

Dear Mr. Roth:

The Braun Corporation was issued a permit on April 20, 1999 for motor vehicle conversion for enhanced access to the physically challenged. A letter requesting that the significant source modification 131-10831 be incorporated into the Part 70 permit was received on April 6, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (with new language bolded and old language stricken):

A.1 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

~~(a) One (1) general assembly area in Plant 3, described as follows:~~

~~(1) Plant 3 Seat Shop, identified as Seat Shop, with a maximum rating of 8 units per hour. This facility operates independently of all other surface coating facilities~~.

(~~b)Seven (7)~~ Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~1~~) **(2)** ~~Chrysler~~ EnterVan **Line No. 1** refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 1** ~~Chrysler~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 1** ~~Chrysler~~. This facility operates independently of all other **refinishing** surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~2~~)**(4)** ~~Ford~~ EnterVan Line No. 2 refinishing surface coating booth, identified as **Enter/Ref. No. 2** ~~Ford~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 2.** ~~Ford~~. This facility operates independently of all other **refinishing** surface coating facilities.

~~(4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other surface coating facilities.~~

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(5)~~ **(6)** ParaTransit Van Line **No. 2** refinishing surface coating booth, identified as Para/**Ref**. 2, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other **refinishing** surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(6)~~ (8) ParaTransit Van Line **No. 3** refinishing surface coating booth, identified as Para/**Ref** 3, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other **refinishing** surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(7)~~ (10) ParaTransit Van Line **No. 4** refinishing surface coating booth, identified as Para/**Ref** 4, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other **refinishing** surface coating facilities.

(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(3)~~ **(12)** ~~New~~ Bus/ParaTransit Van Line refinishing surface coating booth, identified as ~~New~~ Bus/**Ref** ~~Para~~, with a maximum rating of ~~0.83~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID ~~#New~~ Bus/Pa**ra**. This facility operates independently of all other **refinishing** surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Booths

Facility Description [326 IAC 2-7-5(15)]
~~One (1) general assembly area in Plant 3, described as follows:~~

~~(1) Plant 3 Seat Shop, identified as Seat Shop, with a maximum rating of 8 units per hour. This facility operates independently of all other surface coating facilities~~.

~~Seven (7)~~ Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(1)~~ **(2)** ~~Chrysler~~ EnterVan **Line No. 1** refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 1** ~~Chrysler~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 1** ~~Chrysler~~. This facility operates independently of all other **refinishing** surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(2)~~**(4)** ~~Ford~~ EnterVan Line No. 2 refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 2** ~~Ford~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 2.** ~~Ford~~. This facility operates independently of all other **refinishing** surface coating facilities.

~~(4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other surface coating facilities.~~

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(5)~~ **(6)** ParaTransit Van Line **No. 2** refinishing surface coating booth, identified as Para/**Ref**. 2, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other **refinishing** surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(6)~~ (8) ParaTransit Van Line **No. 3** refinishing surface coating booth, identified as Para/**Ref** 3, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other **refinishing** surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(7)~~ (10) ParaTransit Van Line **No. 4** refinishing surface coating booth, identified as Para/**Ref** 4, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other **refinishing** surface coating facilities.

(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(3)~~ **(12)** ~~New~~ Bus/ParaTransit Van Line refinishing surface coating booth, identified as ~~New~~ Bus/**Ref** ~~Para~~, with a maximum rating of ~~0.83~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID ~~#New~~ Bus/Pa**ra**. This facility operates independently of all other **refinishing** surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM emissions from the **Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Para/Assem. No 2, Para/Ref. No. 2, Para/Assem. No 3, Para/Ref. No. 3, Para/Assem. No. 4, Para/Ref. No. 4, Bus/Assem, Bus/Ref., and UN1** ~~Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4~~ surface coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8]

~~(a) Any change or modification that would cause VOC emissions from the application of adhesives from the Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths to be greater than or equal to fifteen (15) pounds per day will require prior approval by IDEM, OAM.~~

~~(b) Pursuant to CP 131-6363, issued on May 14, 1997, any change or modification to any facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.~~

(a) **Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the average volatile organic compound (VOC) content of coatings applied to metal substrates in the EnterVan Line assembly areas (Enter/Assem. No. 1 and Enter/Assem. No. 2) and the Undercoating facility (UN1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings, as delivered to the applicator for any calender day.**

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) **The application of adhesives to metal substrates in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-9 because potential emissions as delivered to the applicator are less than 15 lbs per day per facility. Any change or modification that would cause VOC emissions from these operations to be greater than or equal to fifteen (15) pounds per day per facility will require prior approval by IDEM, OAM.**

(c) **Contact adhesives in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) are applied to wood substrates and could be subject to 326 IAC 8-1-6, but are exempt because potential VOC emissions from each production facility are below 25.0 TPY. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.**

(d) **The refinishing surface coating booths (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref.) are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) by 326 IAC 8-2-9(b)(3), because they are auto refinishing operations. These operations could be subject to 326 IAC 8-1-6 (BACT), but are exempt because each production facility has potential VOC emissions less than 25 tons per year. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.**

(e) **For the purposes of enforcing Conditions D.1.2(c) and D.1.2(d), a production facility is defined as one ParaTransit Van, EnterVan or Bus/ParaTransit Van production line, consisting of one assembly area and one refinishing surface coating booth. Each production line at the source operates independently of all other lines and is treated as a separate facility.**

(f) **The application of adhesives to wood substrates in the EnterVan, ParaTransit Van and Bus/ParaTransit Van assembly areas (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-12 because these coatings are applied to rough structural plywood on the bus and van floors, which are not considered furniture.**

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when the **Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref**. ~~Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4~~ surface coating booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks **(Enter 1, Enter 2, Para 2, Para 3, Para 4 and Bus/Para)** ~~(Chrysler, Ford, #New Bus/Pa, Para 1, Para 2, Para 3 and Para 4)~~ while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.2 (b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily, and shall be complete and sufficient to establish compliance with the less than 15 pounds per day per assembly area VOC emission limits established for coating of metal substrates in Condition D.1.2 (b).

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The total VOC usage per assembly area for each day; and

(4) The weight of VOCs emitted per assembly area for each day.

~~(a)~~ **(b)** To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Compliance Response Plan.

~~(b)~~ **(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Operation of the new equipment incorporated into the Part 70 operating permit by this amendment may commence operation upon issuance of this approval. This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Patrick T. Brennan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 516-691-3395 or in Indiana at 1-800-451-6027 (ext 516-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PTB/MES
cc: File - Pulaski County
U.S. EPA, Region V
Pulaski County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Mindy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

The Braun Corporation
623 West 11th Street
Winamac, Indiana 46996

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: **T131-7058-00017**	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: April 20, 1999

First Significant Permit Modification 131-10831	Pages Affected: 5, 6, 28, 28a, 29, 29a, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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CERTIFICATION FORM

EMERGENCY/DEVIATION OCCURRENCE REPORTING FORM.

QUARTERLY COMPLIANCE MONITORING REPORT FORM

A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary motor vehicle conversion plant.

Responsible Official:	William R. Roth
Source Address:	623 West 11th Street, Winamac, IN 46996
Mailing Address:	P. O. Box 310, Winamac, IN 46996
Phone Number:	219-946-6153
SIC Code:	3711
County Location:	Pulaski
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules Major Source, Part 70 Permit Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating booth, identified as Enter/Ref. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(4) EnterVan Line No. 2 refinishing surface coating booth, identified as Enter/Ref. No. 2, with a maximum rating of 8.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(6) ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(8) ParaTransit Van Line No. 3 refinishing surface coating booth, identified as Para/Ref 3, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other refinishing surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

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(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(12) Bus/ParaTransit Van Line refinishing surface coating booth, identified as Bus/Ref, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Bus/Para. This facility operates independently of all other refinishing surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes insignificant activities, as defined in 326 IAC 2-7-1(21).

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Booths

Facility Description [326 IAC 2-7-5(15)]

Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating booth, identified as Enter/Ref. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

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(4) EnterVan Line No. 2 refinishing surface coating booth, identified as Enter/Ref. No. 2, with a maximum rating of 8.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

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(12) Bus/ParaTransit Van Line refinishing surface coating booth, identified as Bus/Ref, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Bus/Para. This facility operates independently of all other refinishing surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM emissions from the Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Para/Assem. No. 2, Para/Ref. No. 2, Para/Assem. No. 3, Para/Ref. No. 3, Para/Assem. No. 4, Para/Ref. No. 4, Bus/Assem, Bus/Ref. and UN1 surface coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the average volatile organic compound (VOC) content of coatings applied to metal substrates in the EnterVan Line assembly areas (Enter/Assem. No. 1 and Enter/Assem. No. 2) and the Undercoating facility (UN1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings, as delivered to the applicator for any calender day.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) The application of adhesives to metal substrates in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-9 because potential emissions as delivered to the applicator are less than 15 lbs per day per facility. Any change or modification that would cause VOC emissions from these operations to be greater than or equal to fifteen (15) pounds per day per facility will require prior approval by IDEM, OAM.

(c) Contact adhesives in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) are applied to wood substrates and could be subject to 326 IAC 8-1-6, but are exempt because potential VOC emissions from each production facility are below 25.0 TPY. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.

(d) The refinishing surface coating booths (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref.) are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) by 326 IAC 8-2-9(b)(3), because they are auto refinishing operations. These operations could be subject to 326 IAC 8-1-6 (BACT), but are exempt because each production facility has potential VOC emissions less than 25 tons per year. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.

(e) For the purposes of enforcing Conditions D.1.2(c) and D.1.2(d), a production facility is defined as one ParaTransit Van, EnterVan or Bus/ParaTransit Van production line, consisting of one assembly area and one refinishing surface coating booth. Each production line at the source operates independently of all other lines and is treated as a separate facility.

(f) The application of adhesives to wood substrates in the EnterVan, ParaTransit Van and Bus/ParaTransit Van assembly areas (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-12 because these coatings are applied to rough structural plywood on the bus and van floors, which are not considered furniture.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when the Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref. surface coating booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Enter 1, Enter 2, Para 2, Para 3, Para 4 and Bus/Para) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Compliance Response Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly, and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Compliance Response Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.